



U.S. Department of Justice

Criminal Division

Office of the Assistant Attorney General

Washington, D.C. 20530

October 6, 2010

The Honorable Carmen Milagros Ortiz
United States Attorney
District of Massachusetts
1 Courthouse Way
John Joseph Moakley Courthouse
Boston, MA 02210

Attention: Susan Winkler
Assistant United States Attorney

Re: Global Non-Prosecution Agreement for SB Pharmco Puerto Rico, Inc. and
GlaxoSmithKline LLC

Dear Ms. Ortiz:

This is in response to your request for authorization to enter into a global case disposition agreement with the business entities known as SB Pharmco Puerto Rico, Inc and GlaxoSmithKline LLC.

I hereby approve the terms of the plea agreement with SB Pharmco Puerto Rico, Inc., including Paragraphs 5 and 15, and the Side Letter Agreement with GlaxoSmithKline LLC including Paragraphs 1 and 3, in which the United States Attorney's Offices and, with the exception of the Fraud Section, the Criminal Division of the Department of Justice agree not to initiate further criminal prosecutions as set out therein.

You are authorized to make this approval a matter of record in this proceeding.

Sincerely,

Greg D. Andres / MR

Greg D. Andres
Deputy Assistant Attorney General
Criminal Division

